

BEFORE THE
Federal Communications Commission
WASHINGTON, D. C.

DOCKET FILE COPY ORIGINAL

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JUN 27 1994

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Implementation of Section 309(j))
of the Communications Act --)
Competitive Bidding)
)
In the Matter of)
)
Amendment of the Commission's)
Rules to Establish New)
Narrowband Personal)
Communications Services)

PP Docket No. 93-253

GEN Docket No. 90-314
ET Docket No. 92-100
PP-4, PP-5, PP-11,
PP-14, PP-35 through
PP-40, PP-53, PP-69,
PP-79 through 85

TO: The Commission

OPPOSITION OF PAGING NETWORK, INC.

Paging Network, Inc. ("PageNet"), by its attorneys, hereby opposes the "Petition for Stay or to Condition Grant of Certain Nationwide Narrowband PCS Licenses" [hereinafter "Petition"] filed by Echo Group L.P. ("Echo") on June 15, 1994. The Petition asks the Commission to hold a single nationwide narrowband PCS license out of the auction scheduled for July 24, 1994 or, in the alternative, to condition one of the auctioned licenses upon whether Echo prevails in its ongoing efforts to obtain a pioneer's preference.

PageNet is in precisely the same situation as Echo. PageNet filed an application for a pioneer's preference for a nationwide narrowband PCS license and subsequently appealed the Commission's denial of that application. See Paging Network, Inc. v. FCC and United States, Case No. 94-1346 (D.C. Cir., filed April 29, 1994). PageNet opposes the Petition because Echo has not met

the standards for granting a stay. Echo has not shown that it would suffer any harm, much less irreparable harm, and its proposed remedies, aside from being speculative and unnecessary, are prejudicial to other parties and contrary to the public interest.

The Petition correctly notes that a stay will not be granted unless it is necessary to prevent irreparable harm. E.g., Wisconsin Gas Co. v. FERC, 758 F.2d 669 (D.C. Cir. 1985). No one is stopping Echo from obtaining a license. Echo may participate in the narrowband PCS auction along with PageNet and other interested parties. Should Echo ultimately prevail in its efforts to obtain a preference, it could be refunded the difference between the amount it paid at auction to obtain a license and the amount which preference recipients must pay for their licenses. At most, Echo would suffer a modest monetary injury in the opportunity cost of the refunded money. However, it is well-established that "[m]ere economic loss does not constitute irreparable injury." E.g., Cincinnati Bell Telephone Company, 8 FCC Rcd 6709, 6710 (1993) (Chief, Common Carrier Bureau).

Echo's argument that it would suffer irreparable harm rests upon its assertion that "[t]he estimated cost of a nationwide narrowband PCS license at auction is well beyond what Echo could pay." Petition at 9. Echo is treading a fine line here. It reassures the Commission that it is "well qualified financially" to implement its narrowband PCS proposal, yet asserts that it would be financially unable to obtain a license at auction. Id. Echo's claim must be dismissed as sheer

speculation.¹ Echo does not reveal its "estimated cost" of obtaining the desired license, nor does Echo provide the financial data necessary for the Commission to assess or accept its asserted inability to obtain a license at auction. Echo is not entitled to any relief based upon its undocumented fear that a nationwide narrowband PCS license may possibly be more expensive than it can afford.

Moreover, Echo forgets that the Commission has available spectrum to carve out more nationwide narrowband PCS licenses should Echo (or other parties) ultimately win a preference while failing to obtain a license at auction. The Commission has reserved 1 MHz for future narrowband PCS development. Amendment of the Commission's Rules to Establish New Narrowband Personal Communications Services, 8 FCC Rcd 7162, 7165 (1993). Rather than disturb the licenses allocated by auction, the Commission could use this or other spectrum to create any additional PCS licenses necessary to satisfy parties who receive a preference but do not obtain a license at auction. It is not necessary for the Commission to delay its auction schedule or impose conditions on the auctioned licenses to ensure that all preference winners receive licenses.

¹ It also is sheer speculation by Echo that any preference it ultimately succeeds in obtaining would result in a free license. The question whether preference recipients should pay for their licenses is currently before the U.S. Court of Appeals in numerous appeals. E.g., Paging Network, Inc. v. FCC and United States, Case Nos. 94-1327 & 94-1346 (D.C. Cir., filed Apr. 18, 1994 & Apr. 29, 1994).

Wholly apart from the question whether Echo has shown irreparable harm, the Petition must be denied because it would harm the public interest. Echo's request to hold one license out of the auction would negate a valuable public resource for a potentially lengthy period of time. Echo's current appeal, if successful, would result only in a remand of the case back to the Commission. Subsequent agency proceedings could be lengthy and, whatever the outcome, could be subject to additional appeals and still more proceedings on remand. Further uncertainty is created by the pending appeals which challenge the Commission's ability to award any preferences (even the ones already granted) in light of the auction legislation and the proposed repeal of the pioneer's preference regime in ET Docket No. 93-266. Indeed, the appeals are not even completed of the Commission's original decision establishing the pioneer's preference regime, upon which Echo appears to base all its hopes for a nationwide narrowband PCS license. In short, it could be many years before Echo's preference request is finally resolved. It makes no sense for a nationwide narrowband PCS license to remain fallow for years just for this contingency.

Echo's alternative request for a condition upon an individual license is equally unjustified. In effect, Echo would hold that license hostage for however long it takes to litigate Echo's claim to a pioneer's preference. Such a condition might substantially devalue the license, thereby depriving the public of the full monetary value of the license. (Echo has not offered to pay restitution to the public fisc in the event it fails to obtain


a preference.) Further, the condition could make it difficult for the license winner to finance or build its narrowband PCS system, again to the detriment of the public interest. The condition would even have an adverse effect upon the auction for the other, non-conditioned licenses. All nationwide narrowband PCS licenses exhibit value interdependence, and a condition upon one would inevitably affect the value of other licenses and the strategies of the auction participants. The result would be to interfere materially with the auction as a mechanism for ensuring the most efficient valuation and use of scarce PCS spectrum. The Petition should be denied because it would promote the private interest of Echo while affirmatively dis-serving the public interest.

A third independent ground for rejecting the Petition is that it would unduly prejudice other parties. Echo's claim that other parties have not expended "great resources" in preparation for next month's auction (Petition at 10) is both undocumented and wrong. With the auction less than one month away, it is no more than common sense that serious auction participants have been engaged in active preparations for some time. Nor does Echo offer any explanation for why it waited nearly a month after the auction date was announced to file the Petition. Its delay ensured that its Petition could not be decided except at the eleventh hour.

For the foregoing reasons, PageNet opposes grant of the
Petition.

Respectfully submitted,

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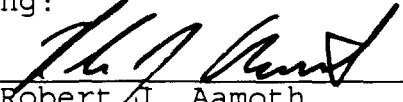
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